

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 GLORIA A. BARRIOS
Supervising Deputy Attorney General
3 SCOTT J. HARRIS, State Bar No. 238437
Deputy Attorney General
4 300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
5 Telephone: (213) 897-2554
Facsimile: (213) 897-2804

6 Attorneys for Complainant

7
8 **BEFORE THE**
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 2010-48

11 PAUL CARMELINO PUNZALAN,
12 a.k.a. PAUL CARMELINO ALCUAZ
PUNZALAN,
13 a.k.a. PAUL PUNZALAN
8566 Hyacinth Street
14 Rancho Cucamonga, CA 91730

A C C U S A T I O N

15 Registered Nurse License No. 651694

16 Respondent.

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18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN, (Complainant) brings this Accusation solely
21 in her official capacity as the Interim Executive Officer of the Board of Registered Nursing
22 (Board), Department of Consumer Affairs.

23 2. On or about January 28, 2005, the Board issued Registered Nurse License
24 Number 651694 to Paul Carmelino Punzalan, also known as Paul Carmelino Alcuaz Punzalan
25 and Paul Punzalan (Respondent). Respondent's registered nurse license was in full force and
26 effect at all times relevant to the charges brought herein and will expire on April 30, 2010, unless
27 renewed.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Gross Negligence)**

3 13. At all times herein mentioned, Respondent was employed as a registered
4 nurse in the Intensive Care Unit (ICU) at San Antonio Community Hospital (SACH) in Upland,
5 California.

6 14. On or about June 20, 2007, Patient A¹ was admitted to the emergency
7 department of SACH seizing and comatose. The patient was diagnosed with a brain stem
8 hemorrhage secondary to hypertensive crisis and was admitted to the ICU. Respondent's co-
9 worker, A.A., with the assistance of Respondent, was assigned to the care of the patient.

10 15. On or about June 25, 2007, Patient B was admitted to the ICU after having
11 presented to the emergency department of SACH on June 24, 2007, with seizure activity.
12 Respondent's co-worker, H.G., was assigned to the care of the patient with Respondent as her
13 preceptor.

14 16. Respondent is subject to disciplinary action pursuant to Code section
15 2761, subdivision (a)(1), on the grounds of unprofessional conduct, in that on or about June 20,
16 2007, and June 25, 2007, while on duty as a registered nurse in the ICU at SACH, Respondent
17 was guilty of gross negligence, within the meaning of Regulation 1442, as follows:

18 a. Respondent administered a bolus injection of Diprivan to Patient A when
19 it was against hospital policy for a registered nurse to administer Diprivan by bolus injection.

20 b. Respondent administered Diprivan to Patient A by bolus injection without
21 a physician's order to administer the drug by bolus injection.

22 c. Respondent administered Phenobarbital 390 mg to Patient B without a
23 physician's order.

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27 1. Patient and Respondent's co-workers names are omitted to protect confidentiality, and
28 will be revealed pursuant to a proper Request for Discovery. "Patient A" is otherwise known as
patient M.K.; and, "Patient B" is otherwise known as Patient D.B.

1 b. On or about June 25, 2007, Respondent prescribed the controlled
2 substance/dangerous drug Phenobarbital 390 mg to Patient B without lawful authority therefor,
3 as further set forth above in subparagraph 16(c).

4 **FIFTH CAUSE FOR DISCIPLINE**

5 **(False Entries in Hospital/Patient Records)**

6 20. Respondent is subject to disciplinary action pursuant to Code section
7 2761, subdivision (a), on the grounds of unprofessional conduct, as defined by Code section
8 2762, subdivision (e), in that in or about June 25, 2007, while on duty as a registered nurse in the
9 ICU at SACH, Respondent falsified, or made grossly incorrect, grossly inconsistent, or
10 unintelligible entries in hospital, patient, or other records pertaining to the controlled substance
11 Phenobarbital, as follows: Complainant incorporates by reference as though fully set forth herein
12 the allegations contained in subparagraph 18(b) above.

13 **PRAYER**

14 WHEREFORE, Complainant requests that a hearing be held on the matters herein
15 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

16 1. Revoking or suspending Registered Nurse License Number 651694, issued
17 to Paul Carmelino Punzalan, also known as Paul Carmelino Alcuaz Punzalan and Paul Punzalan;

18 2. Ordering Paul Carmelino Punzalan, also known as Paul Carmelino Alcuaz
19 Punzalan and Paul Punzalan, to pay the Board of Registered Nursing the reasonable costs of the
20 investigation and enforcement of this case, pursuant to Business and Professions Code section
21 125.3; and

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3. Taking such other and further action as deemed necessary and proper.

DATED: 8/4/09


LOUISE R. BAILEY, M.Ed., RN
Interim Executive Officer
Board of Registered Nursing
State of California
Complainant